

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

NATALIE REESER,

Plaintiff,

v

Case No. 2:14-cv-11916-GCS-MJH
Hon. George Caram Steeh
Magistrate Judge Mona K. Majzoub

**HENRY FORD HEALTH SYSTEM
d/b/a HENRY FORD HOSPITAL,**

Defendant.

MILLER COHEN, P.L.C.

Richard G. Mack, Jr. (P58657)
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PLAINTIFF'S PROPOSED VOIR DIRE

1. What is your full legal name?
2. Did you know anyone on the jury panel prior to today? If so, in what way?
3. Have you ever served previously as a member of a trial jury? If so, when and in which court? Was it on a criminal or civil case? Were you allowed to reach a verdict? What was the outcome of the trial? Have you ever served as a foreperson on a jury? Was there anything about your experience on a jury that would make it difficult for you to sit on this jury?

4. Do you know anyone employed with the Defendant Company? If so, what is the nature of that relationship?

5. Do you know the Plaintiff? If so, what is the nature of the relationship?

6. Have you ever received medical treatment at a hospital or clinic in the Henry Ford Health System? Were you happy with your treatment?

7. Do you know any of the attorneys involved in this litigation?

8. Where do you work?

9. What type of work do you perform?

10. This case involves the Fair Labor Standards Act, which protects employees from termination for raising complaints regarding nonpayment of wages. Have you ever heard of similar cases before? Have you formed an opinion about such cases? If so, what is that opinion?

11. This case also involves the Whistleblower Protection Act, which protects whistleblowers that report or are about to report a violation of the law to a state or federal agency. Have you ever heard of similar cases before? Have you formed an opinion about such cases? If so, what is that opinion?

12. Have you ever been a whistleblower before? What did you report?

13. What do think about whistleblowers? Are they important for our society?

14. Do you have a lunch break at your job? Are you allowed to leave the office for lunch?

15. Have you ever been forced to work through your lunch without pay?

16. Have you ever struggled to pay rent? What did you do in that situation?

17. Have you ever had a bad boss? What made them a bad boss?

18. Have you ever fired an employee? Why?

19. Have you ever been fired from a job wrongfully? Why?

20. Have you ever experienced anxiety or depression? What caused you to feel that way?

21. Have you ever been sexually assaulted? Do you know anyone that has been sexually assaulted?

22. Why do you think people file lawsuits? Do you think that most people that file lawsuits file frivolous cases? Do you think that people that file lawsuits are merely looking for a financial windfall or that they are filing a suit because they believe they have been wronged and they are seeking justice?

23. If under the facts and the court's instructions to you on the law you feel that the plaintiff is entitled to a verdict, is there anything in your feelings or background that would prevent you from awarding money equal to the amount of damages she proves, whatever that may be, to the plaintiff to compensate her for the defendants' conduct, if you so find?

24. What social, civic, fraternal, or political organizations are you a member of?

25. Punitive damages are an element of this case. The court will explain to you when punitive damages are appropriate. The purposes of punitive damages are to punish the defendant for their actions and to deter others from engaging in similar conduct. Is there something in your background or experience that would inhibit you from accepting the concept or awarding punitive damages if justified under the law and the facts?

Respectfully submitted,

MILLER COHEN, P.L.C.

By: /s/ Adam C. Graham

Adam C. Graham (P79361)

Attorneys for Plaintiff

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Detroit, Michigan 48226

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Dated: May 3, 2016

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CERTIFICATE OF SERVICE

I hereby certify that on *May 3, 2016*, the foregoing document was electronically filed by the undersigned's authorized representative, using the ECF system, which will send notification of such filing to all parties of record.

Respectfully submitted,

MILLER COHEN, P.L.C.

By: /s/ Adam C. Graham

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